

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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MELANIE KAIL,

Plaintiff,

-against-

PROFESSIONAL CLAIMS BUREAU, INC.,

Defendant(s).

ANSWER

11 CV 2939  
(WEXLER, J.)  
(BOYLE, M.J.)

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Defendant, by its attorney MEL S. HARRIS AND ASSOCIATES, LLC, answer plaintiff's complaint as follows:

1. Defendant acknowledges being sued pursuant to the Fair Debt Collection Practices Act, but denies any violation thereof.

2. Defendant admits to the allegations contained in paragraph "2" of the complaint.

3. Defendant admits to the allegations contained in paragraph "3" of the complaint.

4. Defendant denies knowledge or information sufficient to form a belief as to each and every allegation contained in paragraph "4" of the complaint.

5. Defendant admits to the allegations contained in paragraph "5" of the complaint.

6. Defendant admits to the allegations contained in paragraph "6" of the complaint.

7. Defendant admits to the allegations contained in paragraph "7" of the complaint.

8. Defendant admits to the allegations contained in paragraph "8" of the complaint.

9. Defendant admits communicating with plaintiff, but otherwise denies knowledge or information sufficient to form a belief as to each and every allegation contained in paragraph "9" of the complaint.

10. Defendant admits to the allegations contained in paragraph "10" of the complaint.

11. Defendant denies each and every allegation contained in paragraph "11" of the complaint.

12. Defendant denies each and every allegation contained in paragraph "12" of the complaint.

13. Defendant denies each and every allegation contained in paragraph "13" of the complaint.

14. Defendant denies each and every allegation contained in paragraph "14" of the complaint.

15. Defendant denies each and every allegation contained in paragraph "15" of the complaint.

16. Defendant denies each and every allegation contained in paragraph "16" of the complaint.

17. Defendant denies each and every allegations contained in paragraph "17" of the complaint.

18. Defendant denies the allegations contained in paragraph "18" of the complaint.

19. Defendant denies each and every allegations contained in paragraph "19" of the complaint.

20. Defendant denies each and every allegations contained in paragraph "20" of the complaint.

21. Defendant denies each and every allegations contained paragraph "21" of the complaint.

22. Defendant denies each and every allegations contained in paragraph "22" of the complaint.

23. Defendant denies each and every allegations contained in paragraph "23" of the complaint.

24. Defendant denies each and every allegation contained in paragraph "24" of the complaint.

25. Defendant denies each and every allegation contained in paragraph "25" of the complaint.

26. Defendant denies each and every allegation contained in paragraph "26" of the complaint.

27. Defendant admits to the allegations contained in paragraph "27" of the complaint.

28. Defendant denies each and every allegation contained in paragraph "28" of the complaint.

29. Defendant admits to the allegations contained in paragraph "29" of the complaint.

30. Defendant denies each and every allegation contained in paragraph "30" of the complaint.

**AS AND FOR A FIRST AFFIRMATIVE DEFENSE**

31. All or part of plaintiff's claim may be barred by the applicable statute of limitations.

**AS AND FOR A SECOND AFFIRMATIVE DEFENSE**

32. Plaintiff's claim fails to state a cause of action.

WHEREFORE, the defendant respectfully requests that plaintiff's complaint be dismissed.

Dated: New York, NY  
August 29, 2011



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TO:

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